

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

KEVIN SCOTT MORRIS

NO. 3:16-CR-511-K

FACTUAL RESUME

In support of Kevin Scott Morris' plea of guilty to the offense in Count One of the indictment, Morris, the defendant, Mark Calabria, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the indictment, charging a violation of 18 U.S.C. § 2422(b), that is, enticement of a minor, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant knowingly persuaded, induced, enticed, coerced, or attempted to persuade, induce, entice, or coerce an individual to engage in any sexual activity, or prostitution, as charged in the indictment;
- Second.* That the defendant used the Internet, the mail, a telephone, a cell phone, or any facility or means of interstate or foreign commerce to do so;
- Third.* That the defendant believed that such individual was less than 18 years of age; and
- Fourth.* That, had the sexually activity actually occurred, could be charged

¹ Fifth Circuit Pattern Jury Instruction 2.91 (5th Cir. 2015).

with the criminal offense of indecency with a child under the laws of the State of Texas.

STIPULATED FACTS

1. Kevin Scott Morris admits and agrees that on or about May 18, 2012, in the Dallas Division of the Northern District of Texas, and elsewhere, Morris, using an airplane, which is a facility and means of interstate and foreign commerce, knowingly persuaded, induced, and enticed John Doe 1, a boy who was approximately thirteen years old, to engage in sexual activity for which the defendant could be charged with a criminal offense, specifically, a violation of Texas Penal Code § 21.11, indecency with a child, which makes it a crime to intentionally and knowingly, with a child younger than seventeen years of age, engage in sexual contact with a child or cause the child to engage in sexual contact.

2. Morris admits that, from at least 2009 through the time of his arrest in this case in 2016, he held himself out to parents and children as a member of law enforcement, a photographer, and/or a film director. In so doing, he convinced minor children and their parents to allow him to photograph children, film children, and even travel with Morris for the purpose of film and photography sessions that his victims thought would lead to modeling and/or acting careers. During these “sessions,” Morris built up the trust of, and groomed, several boys who he then sexually abused and/or used to produce child pornography.

3. Morris agrees that the facts set forth in this factual resume describes his common scheme and course of conduct, which included not only enticing minors but also producing and possessing child pornography.

4. Morris admits that on or about May 18, 2012, in the Dallas Division of the Northern District of Texas, he, did knowingly employ, use, persuade, induce, entice, and coerce John Doe 1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in an affecting interstate and foreign commerce, by using a Panasonic Super Mini digital video tape to create a visual depiction of John Doe 1 engaging in sexually explicit conduct, including a video file depicting John Doe 1 wearing a green speedo, in which John Doe 1 is lying on a bed a motioning his hand in a “come here” manner and says “come here.” The camera zooms in closely to the child’s buttocks and genital region and the child’s scrotum is visible on the side of a speedo in a lewd and lascivious manner. The video also depicts, as the child is lying on his back, a zoomed depiction of the child’s genital area with the speedo pulled down to show the child’s pubic hair. At the time, Morris knew that John Doe 1 was under the age of eighteen.

5. Morris admits that he met John Doe 1 in 2009 when he took photographs of John Doe 1 for modeling purposes. John Doe 1 flew to Dallas in 2012 to stay with Morris for what John Doe 1 and his parents thought were photography and videography sessions. While at the hotel, Morris also put his hand on the penis of John Doe 1 and masturbated him. The following day, Morris took John Doe 1 to Morris’ house, where he

filmed John Doe 1 wearing a speedo and covered in fake blood. Morris watched as John Doe 1 undressed and showered in the bathroom. Afterwards, Morris massaged John Doe 1's buttocks through his clothing. Morris then put his hand on the penis of John Doe 1 and masturbated him again.

6. Morris admits further that when he was arrested by law enforcement in October 2016, he had in his possession a videotape that he had created of John Doe 2, a boy whose identity is unknown to the government, but appears to be between the ages of eleven to thirteen years old. This video depicts John Doe 2 without a shirt and wearing only a thong/bikini underwear. On the video, John Doe 2 states that he is twelve years old. Morris can be heard whispering and giving directions to John Doe 2 to "start saying nasty stuff" and to "lay down." Morris directs John Doe 2 to remove his underwear and specifically directs that he take them "all the way off." John Doe 2 lies on the floor with his genitalia exposed in a lewd and lascivious manner while the camera focuses on John Doe 2's genitalia. John Doe 2 stands in front of the camera naked. Morris asks John Doe 2 if he can perform oral sex on John Doe 2, assuring him that it will feel good. The video then continues in a manner suggesting that Morris performed oral sex on John Doe 2.

7. Morris admits further that in or about August 2011 and again in or about October 2011, Morris enticed John Doe 3, a boy who was approximately twelve years of age, to fly from the Northern District of Texas to Las Vegas, Nevada. Morris told John Doe 3 and his parents that the trip to Las Vegas was to help John Doe 3's modeling career. During both of these trips, Morris produced child pornography of John Doe 3. In

one video, Morris directs John Doe 3 to expose his penis. In another video, Morris filmed John Doe 3 while Morris touched and rubbed John Doe 3's penis.

8. Morris admits further that sometime in 2012 or 2013, he met John Doe 4. John Doe 4 was in the eighth grade at the time and approximately thirteen years old. Morris groomed John Doe 4 over the course of years, used him to produce child pornography, and sexually abused him. In one video created in approximately 2013, Morris told John Doe 4 to remove his clothes and dance. Morris then sexually assaulted John Doe 4 by masturbating him on the video, during which Morris can be heard saying: "Does that feel good boy? Tell me." Morris also sexually abused John Doe 4 by performing oral sex on John Doe 4. Morris can be heard on the video telling John Doe 4 "don't be mad." Upon his arrest, Morris possessed numerous videos of him sexually abusing John Doe 4.

9. Morris admits further that in or about July 2016, Morris enticed John Doe 4, who at the time was under the age of eighteen, to travel to Las Vegas, Nevada. During the trip to Las Vegas, Morris produced videos and images of child pornography depicting John Doe 4.

10. Morris admits further that in or about November 2010, Morris attempted to produce child pornography involving John Doe 5. Morris filmed a video involving John Doe 5, who can be heard on the video saying that he is twelve years old. Morris can be heard on the video asking the John Doe 5 to make a promise about what they talked about before they started filming, to which John Doe 5 responds: "I promise not to tell anyone about this." Morris filmed John Doe 5 while he was wearing underwear and was

shirtless. Morris proceeds to ask John Doe 5 repeatedly to pull down his underwear and expose his penis, telling John Doe 5: "I promise you nobody else will see this but me."

11. Morris admits further that when he was arrested in October 2016, he had in his possession image files of John Doe 6, a boy whose identity is unknown to the government, but appears to be between the ages of eleven to thirteen years old. In at least one of these images, John Doe 6 is depicted wearing red thong underwear, which is pulled down to expose a portion of his genitalia.

12. Morris admits further that when he was arrested in October 2016, he had in his possession a video depicting John Doe 7, a boy whose identity is unknown to the government, but who is prepubescent. In the video, Morris films John Doe 7 as Morris touches and masturbates John Doe 7.

13. Morris admits further that when he was arrested in October 2016, he had in his possession a video depicting John Doe 8, a boy who appears to be between the ages of eleven to thirteen years old in the video. Morris films John Doe 8 as Morris pulls down John Doe 8's underwear and exposes his penis.

14. Morris admits further that when he was arrested in October 2016, he had in his possession a video depicting John Doe 9, a boy who appears to be prepubescent in the video. The video depicts the lewd and lascivious exhibition of John Doe 9's genitalia while John Doe 9 is blindfolded and acting, as part of a "scene," in a "film," as if he is frightened.

15. Morris admits further that when he was arrested in October 2016, he had in his possession a video depicting John Doe 10, a boy who appears to be prepubescent in

the video. The video depicts the lewd and lascivious exhibition of John Doe 10's genitalia.

16. Morris admits further that, in addition to the aforementioned conduct, and part of the same criminal scheme, Morris possessed additional child pornography, including the following:

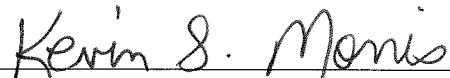
File name	Description
Man_[Redacted]-boy[Redacted]	Video file of a prepubescent male being anally penetrated by an adult male, depicting the genitalia of both the adult male and the boy.
Little Boy Bondage 11Yo And Men Full Version – [Redacted]	Video file of a prepubescent boy with his hands tied behind his back being raped and forced to perform oral sex on adult males.
man [Redacted] grunting toddler boy [Redacted]	Video file of an adult male anally penetrating toddler/prepubescent boy, while the boy can be heard breathing heavily and grunting in pain.
toddler boy [Redacted]	Video file of a toddler boy being sexually abused by an adult male who puts his mouth on the toddler's genitalia and forces the toddler to perform oral sex on the adult male.

17. Morris admits that he used multiple DVDs, SD cards, thumb drives, camera tapes, VHS tapes, digital cameras, and video cameras, which were seized by law enforcement, to commit the criminal scheme described herein.

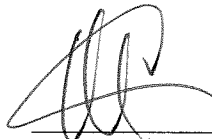
18. The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the indictment.

AGREED TO AND STIPULATED on this 29 day of November, 2017.

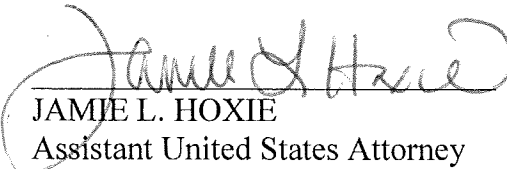
JOHN R. PARKER
UNITED STATES ATTORNEY



KEYVIN SCOTT MORRIS
Defendant



MARK CALABRIA
Attorney for Defendant



JAMIE L. HOXIE
Assistant United States Attorney
New York Reg. No. 4671160
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Tel: 214-659-8600
Fax: 214-659-8812
Email: Jamie.Hoxie@usdoj.gov